

**TECHNICAL REVIEW DOCUMENT
FOR
OPERATING PERMIT 95OPCY024**

to be issued to:

Mull Drilling Co.
Northwest Arapahoe Compressor Station
Cheyenne County
Facility ID 0170018

Prepared by Geoffrey Drissel
October 5, 2004

I. Purpose

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewal operating permit proposed for this site. The original Operating Permit was issued September 1, 1999. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted August 29, 2003, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at <http://www.cdphe.state.co.us/ap/Titlev.html>.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Source Description

This facility is a natural gas compressor station, classified under the Standard Industrial Classification of 1311, which scrubs gas to remove liquids and moisture and then reinjects it into the producing reservoir. The facility is located in a flat rural area 2 miles Northeast of the city of Arapahoe in Cheyenne County, Colorado (SE Section 31, T13S, R42W). The nearest major road is County Road U that makes up the southern boundary of the facility. Two houses are located within 1½ miles of the compressor station. The state of Kansas is an affected state located within 50 miles of the facility. There are no federal Class I areas

within 100 kilometers of the plant. The area in which the plant operates, Cheyenne County, is designated as attainment for all criteria pollutants.

The source is considered to be a minor source (Potential To Emit (PTE) < 250 Tons Per Year (TPY)) for purposes of the Prevention of Significant Deterioration (PSD) program. Facility wide emissions are as follows:

<u>Pollutant</u>	<u>Potential To Emit (tpy)</u>	<u>Actual Emissions (tpy)</u>
NOx	128.1	127.2
CO	143.2	142.3
VOC	26.1	3.4

Potential emissions are based the renewal Operating Permit Limits. Actual emissions are based on the last Air Pollution Emission Notices (APENs) received by the Division (8/26/03).

III. Discussion of Modifications Made:

Source Requested Modifications

The source requested that the following changes be made to the renewal Operating Permit:

- a change in the responsible and facility contact individuals
- a decrease in the annual fuel consumption (scf) for each of the 2 engines listed in point S001 (Caterpillar Engines)
- an increase in the annual NOx and CO emission limitations for each of the 2 engines listed in point S001 (Caterpillar Engines) to reflect an increase in the fuel heating value
- a change in the method of monitoring fuel use in each of the 2 engines listed in point S001 (Caterpillar Engines)
- a deletion of the portable monitoring requirements shown for each of the 2 engines listed in point S001 (Caterpillar Engines)

Other Modifications

In addition to the changes requested by the source, the Division has included changes to make the permit more consistent with recently issued permits, including comments made by EPA on other Operating Permits, as well as to correct errors or omissions identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Northwest Arapahoe Operating Permit. These changes are as follows:

Page following Cover Page

- The information regarding postmark dates following the monitoring and compliance report due dates was revised.
- The citation (above “issued to” and “plant site location”) on the page following the cover page provides the incorrect title for the state act. The title was changed from “Colorado Air Quality Control Act” to “Colorado Air Pollution Prevention and Control Act”. In addition, the dates were removed from the citation.

Section I - General Activities and Summary

- The language in Condition 1.3 was revised to reflect the most current version
- The language in Conditions 1.4 and 1.5 was changed to reflect the revised numbering of the General Conditions.
- The language in Condition 3.1 was revised to more appropriately address the PSD status of the source.
- The language in Section 4 that states the applicability of the Accidental Release Prevention Program (112(r)) was revised.
- Added Section 5 for compliance assurance monitoring (CAM); note that no emission units are subject to CAM.

Section II - Specific Permit Terms

- The language regarding “credible” evidence was updated to reflect the current version.
- References to a specific ASTM method were removed.
- References to “lowest gross heating value” were replaced with “higher heating value”.

Section III – Permit Shield

- The Permit Shield citation was revised.
- The title for Section 1 was changed from “Specific Conditions” to “Specific Non-Applicable Requirements”.
- In addition, the following phrase “In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance” was

added to the end of the introductory paragraph in Section 1.

- Based on comments made by EPA on another permit, the following phrase was added to the beginning of the introductory sentence "Based upon the information available to the Division and supplied by the applicant."

Section IV - General Conditions

- The General Conditions were updated to reflect the current version.

Appendices

- Appendix B and C were revised to reflect the current versions.
- Addresses in Appendix D were revised to reflect current information.